



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 8, 2021

BY CM/ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Luis Merced*, 19 Cr. 832 (ER)

Dear Judge Ramos:

The parties respectfully request that the Court schedule a tentative trial date and a final pretrial conference in the above-referenced case for a date as early on the calendar as practicable. Under the current process of scheduling trials by quarter, we understand that the earliest possible date would be in April 2022, although the parties could be available sooner if the assignment process permits. Counsel for the defendant has proposed a trial date of either April 1, 2022 or May 1, 2022, due to an anticipated conflict from April 15, 2022 through April 22, 2022. The parties understand that the trial date is subject to change by the District's scheduling committee.

Additionally, the Government respectfully requests that the Court exclude time under the Speedy Trial Act between today and the new trial date. The Government respectfully submits that the exclusion of time is in the interests of justice because it will allow for continuity of counsel and provide the defendant with sufficient time to prepare for trial. Counsel for the defendant consents to the exclusion of time.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Andrew K. Chan
Andrew K. Chan
Adam S. Hobson
Frank J. Balsamello
Assistant United States Attorneys
(212) 637-1072 / 2484 / 2325

cc: Counsel for Defendant Luis Merced